

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE)	
COMMISSION,)	
)	
Plaintiff,)	Case No. 19-cv-01711
)	
v.)	Honorable Judge John F. Kness
)	
RIVER NORTH EQUITY LLC,)	
EDWARD M. LICEAGA,)	
MICHAEL A. CHAVEZ,)	
NANOTECH ENTERTAINMENT, INC.,)	
NANOTECH GAMING, INC.,)	
DAVID R. FOLEY, LISA L. FOLEY,)	
JEFFREY A. FOLEY, and)	
BENNIE L. BLANKENSHIP,)	
)	
Defendants.)	

**DEFENDANTS DAVID FOLEY’S, EDWARD M. LICEAGA’S AND
MICHAEL A. CHAVEZ’S MOTION TO STAY**

Defendants David R. Foley (“**Mr. Foley**”), Edward M. Liceaga (“**Mr. Liceaga**”), and Michael A. Chavez (“**Mr. Chavez**”) (collectively, the “**Moving Defendants**”), hereby move this Court for an order staying this action pending the resolution of an active parallel criminal matter, *United States of American v. David Foley and Bennie Blankenship*. See 1:21-cr-00019 (“**Criminal Matter**”). The substantial overlap between the above-captioned matter and the Criminal Matter weighs in favor of a stay of this matter.

The grounds for this motion is set forth in the accompanying memorandum of law in support and the exhibits appended thereto.

Dated: January 18, 2021

Respectfully submitted,

/s/ Mark David Hunter

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/s/ David R. Foley

David R. Foley *Pro Se*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the aforementioned document was filed through the Court's CM/ECF system on January 18, 2021. Parties of record may obtain a copy through the Court's CM/ECF system. The undersigned certifies that no party of record requires service of documents through any means other than the CM/ECF system.

/s/ Mark David Hunter
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